

The Honorable Mary Alice Theiler

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,  
  
v.  
ISAAC SHORACK,  
Defendant.

CASE NO. MJ22-041

COMPLAINT for VIOLATION

18 U.S.C. §§ 2422(b) and 2423(a)

17 BEFORE the Honorable Mary Alice Theiler, United States Magistrate Judge, U. S.  
18 Courthouse, Seattle, Washington.

## **COUNT ONE**

### **(Attempted Enticement of a Minor)**

21        Between in or about January 28, 2022, and continuing through February 2, 2022, in  
22 King County, within the Western District of Washington, and elsewhere, ISAAC  
23 SHORACK used a facility and means of interstate and foreign commerce – to wit, the  
24 Internet and a cellular telephone – to knowingly attempt to persuade, induce, entice, and  
25 coerce an individual who had not attained the age of eighteen years to engage in sexual  
26 activity for which any person can be charged with a criminal offense – to wit, prostitution.

All in violation of Title 18, United States Code, Section 2422(b).

**COUNT ONE**

**(Attempted Transportation of a Minor with Intent to Engage in Prostitution)**

Between in or about January 28, 2022, and continuing through February 2, 2020, in King County, within the Western District of Washington, and elsewhere, ISAAC SHORACK did attempt to transport a minor female from Colorado to Washington State, with the intent that the minor female engage in prostitution or sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2423(a).

And the complainant states that this Complaint is based on the following information:

I, Robert Spivey, being first duly sworn on oath, depose and say:

## **INTRODUCTION**

1. I am a Special Agent with the Federal Bureau of Investigation and have been since 2009. I am currently assigned to Seattle Division's Violent Crimes Against Children (VCAC) squad, where I am responsible for conducting sex trafficking investigations, as well as other child exploitation investigations. In addition to investigating human trafficking, I have investigated violent crime matters, complex financial crimes, and cyber intrusions. I have participated in all aspects of child exploitation and human trafficking investigations, including surveillance, suspect interviews, executing arrest and search warrants, and reviewing digital forensic evidence.

2. I have received both specialized training and on-the-job training in the areas of sex trafficking, the commercial sexual exploitation of children (CSEC), pimping, and prostitution. I have received training, and gained experience in interviewing and interrogation techniques, arrest procedures, search warrant applications, the execution of searches and seizures, and various other criminal laws and procedures. As a Special Agent, I have served as the affiant on previous search warrants, complaints, court orders, and arrest warrants.

1       3. Assisting in this investigation is online undercover Task Force Officer (TFO)  
2 Craig Tangeman. TFO Tangeman has served as a TFO with the FBI's Child Exploitation  
3 and Human Trafficking Task Force in Denver, Colorado since January 2016. TFO  
4 Tangeman is responsible for investigating cases involving human trafficking for the  
5 purpose of sexual servitude. TFO Tangeman is also an Investigator with the Arapahoe  
6 County Sheriff's Office and has been employed in the law enforcement profession for over  
7 22 years. TFO Tangeman has received training in the areas of domestic and international  
8 sex trafficking, the commercial sexual exploitation of children, pimping, prostitution, and  
9 sexual assault investigations. TFO Tangeman has been the lead investigator in over fifty  
10 human trafficking investigations and has assisted in over one hundred additional human  
11 trafficking and prostitution-related investigations.

12       4. The facts set forth in this Complaint are based on my investigation, along  
13 with investigation by other law enforcement officers, conversations with law enforcement  
14 officers, and review of law enforcement documents. It also does not purport to state every  
15 fact known to law enforcement, but rather only those facts I believe necessary to establish  
16 probable cause to conclude that ISAAC SHORACK committed the offenses charged in this  
17 Complaint. As further detailed below, based on my investigation, I submit there is  
18 probable cause to believe that Defendant Isaac Shorack committed the offense of attempted  
19 enticement of a minor and attempted transportation of a minor for the purpose of  
20 prostitution.

## **SUMMARY OF THE INVESTIGATION**

## **22 | A. Background of Investigation**

23        5. On November 15, 2021, the FBI received a tip from the National Human  
24 Trafficking Hotline about potential minor sex trafficking in Seattle, Washington. The  
25 information was submitted by a relative of a suspected minor sex trafficking victim with  
26 the initials L.P. (hereinafter referred to as L.P.). According the reporting person, L.P. had  
27 been forced for approximately three weeks to engage in sex acts in exchange for shelter  
28 and unspecified illicit substances by an unidentified adult male trafficker who resides on a

1 boat in Bellingham, Washington. The reporting person further stated that the unidentified  
 2 male trafficker had taken L.P. to Seattle and introduced her to a different adult male  
 3 trafficker and two potential minor victims, subsequently identified as M.L. and T.M. The  
 4 reporting person stated that L.P. had told her that she (L.P.) was making \$1,500 a day, but  
 5 did not say how she was making the money. L.P. also told the reporting person that she,  
 6 M.L., and T.M. had been evicted from a home in Seattle due to high foot traffic.

7       6. On November 15, 2021, Supervisory Special Agent Steven Vienneau was in  
 8 telephonic and e-mail contact with the reporting person. The reporting person stated that  
 9 the Seattle-based trafficker had provided L.P. with an iPhone (number 360-255-1443) to  
 10 use, as well as set up a bank account for L.P., M.L., and T.M. to use. The reporting person  
 11 stated that the three minors were “working” a corner in Shoreline, Washington, each day  
 12 starting at approximately 3:00 or 4:00 p.m. and did prostitution “dates” at the Nexus Hotel  
 13 in north Seattle. The reporting person further stated that the minors had been in room 125  
 14 at the hotel from approximately August 30 to September 4th or 5th, before moving to an  
 15 apartment. The reporting person provided several photos of L.P. and the other minors  
 16 (M.L. and T.M.) from L.P.’s social media account. One of the photos showed two horses  
 17 and the comment: “Ready to ride some horses.” The photo was tagged with the location  
 18 “BACK COUNTRY HORSE RIDES – Long Beach, WA.” The reporting party e-mailed  
 19 that L.P. had been at a ranch in Long Beach, Washington, until November 16, 2021, and  
 20 had been “in a Lamborghini.” The reporting party further described minor M.L. as a  
 21 sixteen-year-old white female with blonde hair, blue eyes, approximately five feet three  
 22 inches tall and a thin build.

23       7. Upon receiving this information, the FBI contacted the Long Beach Police  
 24 Department (LBPD), who directed officers to respond to the Back Country Horse Rides  
 25 ranch to recover L.P., M.L., and T.M. or confirm that they had been there. On November  
 26 16, 2022, when the officers arrived, the minors were no longer there, but the ranch  
 27 manager, B.H., recalled having seen them after being shown pictures of the minors. B.H.  
 28 provided LBPD officers with a signed liability waiver that included the names and

1 signatures of individuals who had ridden horses at the ranch on November 13, 2021. The  
 2 signatures on the waiver included Defendant Isaac Shorack, L.P., M.L., and T.M.

3       8.     B.H. was subsequently interviewed by FBI special agents on January 12,  
 4 2022. During that interview, B.H. stated that he recalled that the three girls were with two  
 5 black males. He stated that both of the males were tall, skinny, and in their early twenties.  
 6 He further said that one of the males appeared to be in charge and did most of the talking  
 7 and was "charismatic. He said that the other male was quiet. B.H. stated that the group  
 8 was from Seattle. He thought that they arrived in a "flashy" car, but he could not recall  
 9 anything specific. B.H. stated that none of the girls appeared scared and they all had big  
 10 smiles on their faces.

11       9.     During a follow-up interview on January 13, 2022, B.H. was with J.B., a  
 12 wrangler who helped him the day the girls were at the ranch. B.H. stated that J.B. had  
 13 interacted with the group more than he had. B.H. told law enforcement that he recalled  
 14 there were four girls and only one black male in the group, and that they drove a silver or  
 15 dark silver Suburban.

16 **B. November 18, 2021 Recovery of L.P. and T.M. and Consent Search of Their  
 17 Cell Phones**

18       10.    On November 18, 2021, L.P. and T.M. were contacted by Seattle Police  
 19 Department (SPD) detectives in a prostitution sting. SPD detectives confirmed that both  
 20 L.P. and T.M. were minors. FBI Special Agent Hippe and Supervisory Special Agent  
 21 Vienneau responded to the police station and contacted L.P. and T.M., who consented to a  
 22 search of their cell phones. SA Hippe conducted a forensic extraction of the two phones,  
 23 which I subsequently reviewed.

24       11.    Consistent with the information provided by the reporting person, L.P.'s cell  
 25 phone was an iPhone with phone number 360-255-1443. T.M.'s phone was an iPhone with  
 26 phone number 206-747-1231. During a review of the phone extraction of L.P.'s phone, I  
 27 observed a group chat that included the following participants: (1) phone number 206-696-  
 28 4026, which was not a saved contact in L.P.'s phone but was saved under the contact name

1 “Ike” in T.M.’s phone; (2) a phone number saved under the contact name “Jae”; (3) a  
 2 phone number saved as a name associated with M.L.; (4) an iCloud account associated  
 3 with L.P.; (5) a phone number saved as a name associated with T.M., which was the same  
 4 number as the phone that T.M. gave the FBI consent to search (206-747-1231); (6) a phone  
 5 number saved as “B”; and (7) a phone number saved under the contact name “Kelsie.” The  
 6 chat began on September 8, 2021, and ended November 18, 2021, the date L.P. and T.M.  
 7 were recovered by law enforcement. As set forth in greater detail below, the texts in the  
 8 group chat indicated that “Ike” was a pimp and that L.P., T.M., M.L., “Jae,” “B” and  
 9 “Kelsie” were engaging in commercial sex acts in the north Seattle area at “Ike’s” behest.  
 10 L.P., T.M., M.L., and “B” appear to be actively engaged in commercial sex acts for “Ike”  
 11 during this entire period, while “Jae” and “Kelsie” are active for only parts of this period.

12       12. The following text messages sent by Ike indicate that he was a pimp/sex  
 13 trafficker directing the others in the group chat (hereinafter referred to collectively as “the  
 14 victims”) to engage in commercial sex acts:

- 15       • On September 12, 2021 Ike messaged, “Let’s use this group chat for blade work  
       16 purposes only.” I know through training and experience that the term “blade” refers  
       17 to an area of open air prostitution. I am further aware that north Aurora Avenue in  
       18 Seattle is often referred to as “the blade,” and that prostitution is very common  
       19 along this stretch of road.
- 20       • In numerous messages, the victims and Ike refer to “dates” and “tricks.” I know  
       21 through training and experience that in this context, these terms refer to sex buyers.
- 22       • On September 10, 2021, Ike messaged: “[M.L.] and [T.M.] Trap out the room J &  
       23 [L.P.] trap out the room.” I know through training and experience that the word  
       24 “trap” is often used by those engaged in the prostitution industry to refer to  
       25 engaging in commercial sex.
- 26       • On September 11, 2021, Ike messaged: “Reminder that we don’t do nothing RAW!  
       27 Nothing raw. What so ever. We always use condoms.” I know through training  
       28 and experience that “raw” refers to sex without a condom. L.P. replied “I’ve been  
       known that,” and Ike responded “We’ll then stop sucking dick raw.”

- 1 • On October 2, 2021, Ike messaged, “I know the cops are out, keep hoeing around  
2 them. Walk the whole blade... even if you gotta go all the way to Key bank.” I  
3 know through training and experience, “hoeing” refers to engaging in commercial  
sex.
- 4 • On October 19, 2021 Ike messaged, “Still disappointed no one on my team does  
5 anal,” referring to anal sex. L.P. replied, “I do tf for the right price.” M.L.  
6 messaged, “I did like 5 secs of anal today,” and Ike replied, “Stop lying [M.L.]”  
7 “B” and T.M. respond that they will not do anal sex. Ike messages: “\$500 is out anal  
price.”

8       13. Throughout the group chat Ike makes clear that his role in the organization is  
9 that of a pimp/trafficker. On September 8, 2021, Ike messaged:

10           Glad y'all having a good day off [heart emoji]  
11           Reminders: We work hard play hard,  
12           I'm not a parent, & I'm not a boyfriend.  
13           I'm a P  
14           With that being said, turn up, have fun, but remember when it's time  
15           to go it's time to go.  
16           Tomorrow: [T.M.] will be there to get food for everyone in the  
17           morning  
18           We are 10 toes on the blade, by 2:30 p.m. Not a second later.  
19           We are sober enough to work and not be stupid  
20           We are focused.  
21           Whatever y'all do tonight, better not fuck up the room situations, &  
22           better not affect how we act tomorrow.  
23           Let's be respectful, professional, and locked in tomorrow [100 emoji]  
24           Big weekend ahead. A lot of moving parts, communication will be  
25           key.  
26           I'm no longer tolerating, talk back, attitude, or disrespect.  
27           Y'all know my expectations  
28           Thank you, have a good night.  
          Let me know if you need anything.

I know through training and experience that traffickers often use the letter “P” and/or  
images of “P” to mean pimp or to refer to themselves as a pimp. In addition, based upon  
this training and experience, I interpreted Ike’s instruction to have “10 toes on the blade, by

1 2:30 p.m. Not a second later” to mean that he expected the victims to be ready to walk the  
2 street in order to engage in commercial sex at that time.

3       14. Throughout the chat Ike directs victims with regards to when to report to “the  
4 blade;” where to stand on “the blade;” where to engage in commercial sex encounters,  
5 including cars and their rooms; how much to charge for commercial sex encounters, often  
6 referring to them as “dates;” how to respond if contacted by law enforcement; how to act  
7 with sex buyers, often referring to them as “tricks;” and how to act around other pimps,  
8 often using the terms “in pocket” and “out of pocket.” I know through training and  
9 experience that “in pocket” in the pimping/prostitution culture refers to a victim being  
10 under a pimp’s control and following his instruction.

11       15. On September 25, 2021, Ike messaged the group chat: “I’ll be posted around  
12 the hotel & timing dates. In and out today No excuse.” Ike went on to say: “We’re down  
13 until I feel like they’re ain’t no more tricks to be got. Pace yourself, be patient with  
14 yourself! Use lube. Stick to your timers. Only contact me for P’s out of line sweating  
15 you, emergency’s with weird tricks, or if you feel like the Feds are on you. Other than that,  
16 have your phones on, listen for my instruction & reply in a timely manner.” Based upon  
17 my training and experience, I interpreted this message to mean that Ike was instructing his  
18 victims that they were to remain on the street until he determined that they were unlikely to  
19 engage with any other sex buyers, and to follow time limits for each “date.” I also  
20 interpreted Ike to be emphasizing that the victims were only to contact him if another pimp  
21 attempted to recruit them, if they had a “weird” sex buyer, or if they believed law  
22 enforcement was present.

23       16. After sending that message, Ike sent the following text:

24           If any bitch feels like arguing with me today! Pack your shit and go home  
25 I give such clear instructions... that there should be no reason that I ! Have to  
clarify myself to y’all.

26           It should be “yes sir” or “I got you”

27           End of story.

28           If you have a question about the instruction . . . I can answer.

1           But I'm tired of saying something, and then someone chiming in their  
2           opinion of what they think. I DIDNT ASK!

3         17. On October 1, 2021, Ike messaged: "If anyone asks you about IKE, it's none  
4         on there business. The answer is 'I got folks' 'I'm happier than ever.'" I know through  
5         training and experience that "folks" is used in the pimping and prostitution culture to refer  
6         to pimps and the sex workers under their control. Based upon this same training and  
7         experience, I interpreted this message to be Ike telling his victims not to provide any  
8         information about him if asked, but to simply state that they had a pimp "family" and were  
9         happy.

10        18. On numerous occasions the messages indicated that Ike used physical  
11        violence to control his victims. On October 1, 2021, Ike messaged, "B got her ass beat  
12        bad. If I were y'all Id text her something sweet about how you appreciate her & look to  
13        her like and older sister and hope to see her tomorrow." Then Ike messaged, "And say that  
14        you all have experienced my discipline." I interpreted this text message to mean that Ike  
15        was informing his other victims that he had beat up "B," and that the other victims should  
16        reach out to "B" and say that they had also been beaten up by Ike in the past.

17        19. On October 10, 2021, Ike messaged:

18           This week was not a good week...if I had to Grade it I would give it a D-  
19           I think what scares me the most is we like to act like we are oblivious as to  
20           why we are getting a poor Grade...that! Or we just like to play dumb

21           This week left me with a lot of doubt!

22           I'm starting to question myself.

23           Is my pimpn getting to soft?

24           Did I get them an apartment to quick?

25           Are they mentally strong enough to make it through the rain?

26           Are they committed to me as much as I'm committed to them?

27           Am I waisting my time?

28           Do they belong on the team? Or do I scrap it all and restart...

            And Y'all should take pride in your hoein! Take pride in representing IKE  
            TURNHER

1       20. I interpreted this message as Ike expressing frustration with his victims for  
 2 not earning him enough money, and that he was questioning whether he was being too  
 3 “soft” with his victims and whether he should “restart with others.” Ike also refers to  
 4 himself as “IKE TURNHER” in this message. I am aware that many pimps/traffickers use  
 5 a street/pimp name to refer to themselves. I also am aware that the phrase “turn her” is  
 6 often used by pimps to describe recruiting a victim to engage in commercial sex for them,  
 7 and that Ike Turner was a musician who is well known for his extreme physical abuse of  
 8 his wife, singer Tina Turner.

9       21. On October 17, 2021, Ike messaged: “Everything for the first time in my  
 10 pimp career is completely set up for you guys to achieve nothing but success . . .” Ike then  
 11 messaged the group about recruiting others to work for him:

12           If y'all ever meet a bitch you want to knock, or a friend you think of  
 13 who wants to join the team.

14           Y'all can show them these pics as a means to show that I'm a real P  
 15 who ain't getto and a bumb.

16           Not saying we're knocking anyone!! But when the time comes to  
 17 grow.  
 18           Use theses

- 19           -never use my real name
- 20           -never show my real ID
- 21           -and never Imply much about your situation

22           Other than your elevating and they should come home this way and  
 23 touch some real money with som real pimpin

24 I am aware that the term “knock” is used by those in the pimping/prostitution culture to  
 25 refer to recruiting a victim to work for a pimp.

26       22. Accompanying this text message were three pictures of a black male. One  
 27 picture is of a black male leaning against a black car with yellow trim on the front bumper  
 28 that appears to be the Dodge Charger with yellow trim on the bumper, further described  
 below. A graphic of a black male wearing a crown was placed over the male’s face. I  
 know through training and experience that crowns are used in the pimping/prostitution

1 culture to represent pimps. The second photo shows a black male with the same graphic  
2 covering his face in a hot tub, while the third photo shows a black male in a suit. Law  
3 enforcement subsequently located identical photographs of Defendant Shorack, without the  
4 graphic covering his face, on social media accounts associated with Shorack. I interpreted  
5 this text message and photos to be “Ike” trying to encourage his victims to recruit other  
6 victims to work for him by portraying him as a successful pimp.

7       23. On October 24, 2021, Ike sent another message encouraging his victims to  
8 find someone vulnerable to exploitation to work for him:

9             Snap, Instagram, old phone number...  
10           Who can we knock? Whos broke?  
11           Who's down bad, or has willing potential to be a hoe . . .

12           Y'all can't tell me in this whole world . . . that none of any of the people we  
13 know aren't good candidates.

14           We gotta search deep, and see who we can knock. We don't sell a dream &  
15           we don't lie. We just keep it real & tell them the truth & the benefits we  
16           have experienced ourselves.

Ike then gave his victims a script to follow if someone was interested and wanted to know  
more about pimping for him.

The question “sooo what is it like?”

“So what should I know about it?

Here's a template to answer:

So Aurora is what we call the blade, It's in North Seattle. It's a coo little  
road where there's hella traffic and motels.

Hella hoes be out there making crazy good money.

A hoe mentality is a girl that don't want to work a 9-5, wants Financial  
freedom. With the ability to live in a nice spot, drive nice cars! And best of  
all travel.

Essentially how it starts, is you choose up. Choosing up is when you choose  
a Pimp.

Many girls ask why you need a pimp . . .

They get bad rep from society. . . but a P is a necessity in this game, & to put  
you on game, teach you the ins and outs of how to get your money up, &  
protection.

1 We have one of the best and most well known P's not just in Seattle. But all  
 2 over.

3 He's a young real estate agent who really believes in this lifestyle.  
 4 A p job is motivate and elevate the girls he works with. Ike has 5 & is  
 growing rapidly.

5 Essentially if you started working, you would work with me and some of the  
 other girls. We would ease you into it & teach you

6 Everyone got there own thought on it, but those that commit to the game run  
 up a check!

7 But I make what I made off 40 hour weeks in 1 day.

8 I make like 2k a day. Sounded scary at first but it's a crazy fun lifestyle.

### 9 C. Identification of "Ike" as Defendant Isaac Shorack

10 24. Public source information for the number associated with "Ike" (206-696-  
 11 4026) showed it was associated with Defendant Isaac Shorack. As noted above, Shorack's  
 12 name and signature was on the liability waiver for Long Beach Horse Rides, Inc.,  
 13 indicating that he had been at the ranch the same day as L.P., M.L., and T.M. Upon  
 14 learning this information, SA Hippe and I obtained Shorack's driver license information  
 15 and photograph, vehicle registration, and criminal history, which included an arrest on June  
 16 10, 2021, by the Seattle Police Department (SPD) for promoting prostitution. On January  
 17 18, 2022, I obtained the SPD reports pertaining to the arrest and saw that Shorack's phone  
 18 number was listed in the report as 206-696-4026.

19 25. While reviewing the group chat described above, I observed the following  
 20 evidence that further indicated that Defendant Isaac Shorack was the individual using  
 21 phone number 206-696-4026 and identified in T.M.'s phone as "Ike":

- 22 • On September 11, 2021, Ike/206-696-4026 sent the group chat a screen capture of a  
 23 reservation for "Isaac Shorack" on Alaska flight 1017 from Minneapolis to Seattle,  
 along with the message "See y'all at 10:06 tomorrow," which was the scheduled  
 24 arrival time for the flight.
- 25 • On September 12, 2021, Ike/206-696-4026 messaged a picture of a black Dodge  
 26 Charger, Daytona edition, with yellow trim on the front bumper, captioned  
 27 "Daddy's new whip." I know through training and experience that "Daddy" is a  
 term used in the pimping and prostitution culture to refer to a pimp and sex  
 28 trafficking victims often refer to their pimps as Daddy. Based upon a sign that was

1 partially visible, the picture appeared to have been taken at a Jeep Ram dealership. I  
 2 observed the businesses Gerber Collision & Glass and Indo Café across the street  
 3 from the dealership in the photograph. I searched online and located Chrysler  
 4 Dodge Jeep Ram of Seattle, with the address 13733 Aurora Avenue North in Seattle.  
 Across Aurora Avenue are the businesses Indo Café and Gerber Collision & Glass.

- 5 • On September 13, 2021, Ike/206-696-4026 messaged, “Good luck looking for a  
  6 white jeep.” I am aware from SPD police records that Shorack was contacted in a  
  7 white Jeep when he was arrested in June 2021 for attempting to recruit an  
  8 undercover police officer to prostitute.
- 9 • On September 17, 2021, Ike/206-696-4026 sent a message to the group chat stating  
 10 that the victims could show reviews from his clients to anyone who claimed he (Ike)  
 11 did not actually sell real estate. He sent two screen captures of what appears to be an  
 12 Instagram account “shorack\_properties” that included several reviews addressed to  
 13 Isaac. “Isaac Shorack” appears under the profile picture, along with “Seattle Real  
 14 Estate Agent @sothebyrealty.” I compared the profile picture with Shorack’s DMV  
 photograph, and they appear to be the same person.
- 15 • On October 8, 2021, Ike/206-696-4026 messaged the group a screen shot of an  
 16 Amazon order along with the message, “Hand, feet & toe warmers en route.” The  
 17 order showed that the items were being shipped to Isaac Shorack at an address in  
 North Seattle.
- 18 • On October 12, 2021, Ike/206-696-4026 messaged: “These P’s could never actually  
 19 have a car in their name! With the registration in the glove compartment,” along  
 20 with a picture of the front of a black car with yellow trim that appears to be the  
 21 above-described Dodge Charger. The license plate is blurry, but appears to read  
 22 CAP0196. I am aware through Washington State Department of Licensing records  
 23 that Shorack is the registered owner of a 2021 Dodge Charger with license plate  
 24 CAP0196. The title of the Dodge Charger was transferred to Shorack on October  
 13, 2021.
- 25 • On October 19, 2021, Ike/206-696-4026 messaged the group a picture of the back of  
 26 a Bank of America card, number ending in 6635, in the name of “ISAAC K  
 27 SHORACK.” The messaged included, “For today. Put this in your phones for  
 Uber. Remove the other ones you might have. Ask [T.M.] if you need help.”  
 28 [T.M.] replied with a screen shot that showed she tried to use the card for Uber and

1 received the following response: "This payment method is being used by too many  
 2 Uber accounts. Please add a different one to continue." Ike/206-696-4026 replied  
 3 to use a different card instead, sending a picture of the back of a different Bank of  
 4 America card, number ending in 1773, in the name of "ISAAC K SHORACK."  
 5 Ike/206-696-4026 messaged, "Everyone use this one, if there was ever a day to try  
 6 your best to not Uber. Today is the day. And please text me before you request and  
 7 Uber for every Uber today, so I can monitor it."

- 8
- 9 • On October 23, 2021, Ike/206-696-4026 messaged a screen capture showing  
 10 negative COVID test results for "Isaac Kirabo Shorack, DOB XX/XX/1999."

11       **D. Shorack's Collection and Handling of the Proceeds of His Victim's Commercial  
 12 Sex Acts**

13       26. SA Hippe subsequently served legal process on Bank of America and learned  
 14 that two accounts were associated with Shorack: an account in the name of Isaac K.  
 15 Shorack ending in 7185 (hereinafter "Account 7185") and an account in the name of Isaac  
 16 K. Shorack ending in 0612 (hereinafter "Account 0612"). Shorack is the sole signer for  
 17 both accounts.

18       27. I reviewed the bank statements for these accounts during the time period of  
 19 the group chat. In the group chat, Shorack often gave a daily total for how much the girls  
 20 earned through commercial sex, sometimes praising them and sometimes disappointed by  
 21 their efforts. I reviewed the bank statements and observed ATM deposits coinciding with  
 22 the messages, including the following examples:

- 23 • On September 12, 2021, Shorack messaged the number "5,700" to the group chat  
 24 and stated that he was proud of everyone, that "Last night was the team I've  
 25 dreamed of and worked so hard to build" and "Patience, consistency, & loyalty are  
 26 what pays off in this game." On the same day Shorack sent this text, \$5,710 was  
 27 deposited into Account 7185 via ATM at a Bank of America branch identified in the  
 28 records as "AURORA NORTH SHORELINE WA," (hereinafter "the Aurora  
 ATM").
- On September 19, 2021, Shorack messaged: "6,275 ON A SLOW NIGHT." Bank  
 records show that on the same day, \$6,275 was deposited at the Aurora ATM into  
 Account 7185.

- 1     • On September 21, 2021, at 1:56 a.m., Shorack messaged “3,600.” Bank records  
2     show that on that same day, \$3,608 was deposited at the Aurora ATM into Account  
3     7185.
- 4     • On September 24, 2021, Shorack messaged “Please have trap ready” and “Be there  
5     in 3 mins.” He then messaged a photo of a Bank of America deposit in the amount  
6     of \$6,335. Bank records show that on that same day, \$6,335 was deposited at the  
7     Aurora ATM into Account 7185.
- 8     • On October 1, 2021, Shorack messaged “Good job working the blade tonight ladies.  
9     7,800 on a Thursday is insane.” Bank records show that on that same day, \$7,854  
10    was deposited at the Aurora ATM into Account 7185.
- 11    • On October 3, 2021, Shorack messaged to get the “trap” ready and that he had just  
12    pulled in. He then messaged “9075 as a team! Fantastic job ladies.” Bank records  
13    show that on October 4, 2021, \$9,075 was deposited at the Aurora ATM into  
14    Account 7185.
- 15    • On October 5, 2021, at 1:31 a.m., Shorack messaged “6,300 on a Monday.” Bank  
16    records show that on October 6, 2021, \$5,620 was deposited at the Aurora ATM  
17    into Account 7185.
- 18    • On October 13, 2021, Shorack messaged a picture of a Bank of America deposit in  
19    the amount of \$1,240. He then sent a message indicating that he was not happy with  
20    this amount, stating “We giving it our best effort? Or we just half assing it.” Bank  
21    records show that on that same date, \$1,240 was deposited at a Bank of America  
22    ATM identified as “LAKE CITY SEATTLE WA” (hereinafter “the Lake City  
23    ATM”) into Account 7185.
- 24    • On October 20, 2021, Shorack messaged a picture of a Bank of America deposit in  
25    the amount of \$4,461. Bank records show that later that same day, \$4,461 was  
26    deposited at the Aurora ATM into Account 7185.
- 27
- 28

1      **E. Introduction of Fictitious Persona “Niki”**

2      28. On January 28, 2022, I informed FBI Task Force Officer (TFO) Craig  
 3 Tangemen of the Denver, Colorado Field Office that I was currently investigating a child  
 4 sex trafficker who was suspected of pimping multiple girls in the Seattle area.

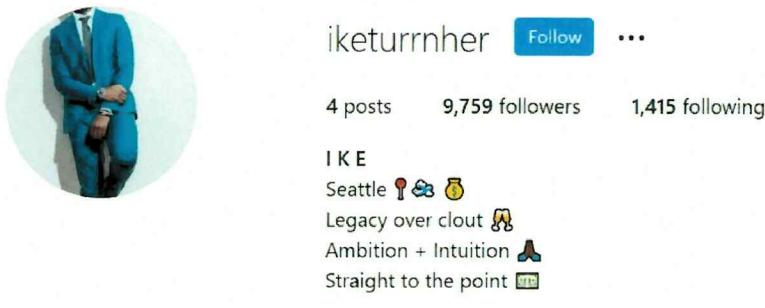
5      29. Through training and experience, TFO Tangeman has learned that subjects  
 6 who traffic and exploit others for the purpose of sexual servitude commonly use social  
 7 media platforms on the internet to recruit and sexually exploit their victims. One of those  
 8 platforms is Instagram, a publicly accessible communications and social media website. In  
 9 an effort to combat the recruitment of women and children for the purpose of sexual  
 10 exploitation via the Instagram platform, TFO Tangeman previously created the fictitious  
 11 undercover (UC) persona “Niki” on Instagram (Niki303g). When TFO Tangeman created  
 12 the fictitious profile, he used several different photographs that he had received from a paid  
 13 FBI female Confidential Human Source (CHS). The photographs that were provided by  
 14 the CHS were for the purpose of investigating sex buying and sex trafficking. The CHS  
 15 does not have any knowledge of this investigation. The undercover Instagram account  
 16 does not show what Niki’s age is and is not visible to other Instagram users. TFO  
 17 Tangeman sent all of the Instagram messages and text messages described below from  
 18 within the State and District of Colorado.

19      30. On January 28, 2022, I advised TFO Tangeman that the subject’s name was  
 20 Isaac Shorack, and that evidence obtained from the forensic review of L.P. and T.M.’s  
 21 phoen indicated that he was trafficking minors and attempting to recruit other victims into  
 22 a life of prostitution where he would act as their pimp and take their earnings. I also  
 23 advised TFO Tangeman that Aurora Avenue is an area commonly referred to as “the  
 24 blade” that is known for prostitution. I told TFO Tangeman that Shorack is active on  
 25 Instagram and that his account was under “iketurrnher.” I further advised that Shorack was  
 26 the confirmed user of 206-696-4026, as described above. I requested TFO Tangeman’s  
 27 assistance with investigating Shorack’s potential online recruitment activities.

1       31. On January 28, 2022, while acting in a covert capacity as Niki, TFO  
 2 Tangeman used the “Niki303g” Instagram account to locate the “iketurrnher” Instagram  
 3 account. The “iketurrnher” Instagram account was private so TFO Tangeman requested  
 4 permission to follow this user by clicking the “follow” button.

5       32. On January 29, 2022, TFO Tangeman noticed that his request to follow  
 6 “iketurrnher” was approved, at which point they were both following each other’s accounts  
 7 and communicating via the Instagram application. Instagram is a social networking site  
 8 that is typically accessed via the Instagram application once it is downloaded to a device  
 9 capable of communicating via the internet. Once the application is downloaded, the  
 10 Instagram application allows its user to share images, post reels, and communicate via a  
 11 message and video platform.

12       33. After the user of “iketurrnher” allowed TFO Tangeman to follow his  
 13 Instagram account, TFO Tangeman viewed the images, posts, and reels that the user had  
 14 uploaded to the account. The profile picture was of a black male wearing a blue suit. On  
 15 the profile page it indicated the user’s name was “Ike” and contained the following  
 16 information:



17       There were six images uploaded to the “iketurrnher” Instagram account. All six images  
 18 depict the same black male posing in the pictures. Three of the images depict him in front  
 19 of higher end vehicles and one of the images shows him fanning out money. There were  
 20 also two video reels uploaded to the account. One depicted the same black male at a  
 21 barbershop and the second depicted an unidentified person driving a Lamborghini with a  
 22  
 23  
 24  
 25  
 26  
 27  
 28

1 banner across it that stated “back home.” The black male was not seen in the reel depicting  
 2 the Lamborghini.

3       34. I forwarded TFO Tangeman a copy of Shorack’s Washington driver’s license  
 4 and his photograph. After comparing the driver’s license photograph of Shorack to the  
 5 images of the male that were uploaded to the “Iketurnher” Instagram account, TFO  
 6 Tangeman concluded that Shorack was the man pictured in the Instagram images. The  
 7 images of Shorack that were uploaded to the “iketurnher” Instagram account were done in  
 8 a manner that suggested Shorack was the user of the account. Based on the information  
 9 provided by me to TFO Tangeman, and the images of Shorack that were uploaded to the  
 10 “iketurnher” Instagram account, “ike” and the user of the “iketurnher” Instagram account  
 11 will be hereinafter referred to as Shorack.

12       35. On January, 29, 2022, TFO Tangeman, posing as “Niki,” initiated  
 13 communication with Shorack by sending him the following message through the Instagram  
 14 messaging platform: “Ever been to Denver. I feel like we’ve met b4.” Shorack replied  
 15 “Haven’t been.” TFO Tangeman responded “oh . . . my bad.” Shorack then asked if TFO  
 16 Tangeman had ever been to Seattle. TFO Tangeman told him that he had not, but that he  
 17 had heard it was pretty “dope” in Seattle. Shorack replied, “Yah you should come check it  
 18 out. I’d love to take you to dinner.” TFO Tangeman replied that if he was in Seattle, he  
 19 would be down with that. Shorack asked, “how do we get you here?” TFO Tangeman  
 20 replied that he didn’t know but that would be “fire.” Shorack stated “Let’s get you in a  
 21 flight” and then asked “You a 304.” Both TFO Tangeman and I are aware from training  
 22 and experience that the term “304” is used in the pimping/prostitution culture to mean  
 23 “hoe,” since 304 turned upside down it spells, or is intended to mean, “hoe.” In the  
 24 pimping and prostitution culture, the word “hoe” is used as a derogatory term for a  
 25 commercial sex worker.

26       36. TFO Tangeman replied to this message by asking, “304?” TFO Tangeman  
 27 then sent Shorack the following message: “Oh . . . I just figured that out lol. I’ve been  
 28 called worse . . . ” Shorack replied by saying he was confused and that “Its not a bad

1       thing.” TFO Tangeman told Shorack that he didn’t have anything going on in Denver and  
 2       asked what it was like out there (Seattle). Shorack replied: “Seattle is incredible. One of  
 3       the best blades in the country. Cops don’t bother no one; and if you fuck with the right  
 4       dude! You can really elevate.” TFO Tangeman replied: “like you. Lol. I wouldn’t know  
 5       where to star doin that out there... never been there.”

6           37.      TFO Tangeman and I are aware through training and experience that the  
 7       word “blade” in the pimping and prostitution culture refers to an open-air commercial sex  
 8       location, typically where commercial sex workers walk the streets to make contact with sex  
 9       buyers. TFO Tangeman and I also know from training and experience that when sex  
 10      traffickers recruit victims through social media they often use the word “elevate” as a  
 11      coercive technique to make the victims they are recruiting believe they can do better in life,  
 12      or “elevate,” if they work with them. Shorack replied on January 30, 2022, at 12:30 a.m.  
 13      “Haha text me 206-696-4026.”

14           38.      In response to this message, on January 30, TFO Tangeman switched from  
 15      messaging with Shorack on the Instagram platform to texting with him at 206-696-4026.  
 16      The undercover phone number TFO Tangeman used to communicate with Shorack was  
 17      720-310-3884. Posing as “Niki,” TFO Tangeman sent Shorack a text that stated “Hey its  
 18      Niki from IG.” After exchanging pleasantries, Shorack asked if TFO Tangeman lived in  
 19      Colorado. TFO Tangeman replied by telling him, “Yep . . . I do now.” Shorack told TFO  
 20      Tangeman his Instagram account looked like a spam account and then asked if TFO  
 21      Tangeman was a real person. TFO Tangeman replied in the affirmative and then asked if  
 22      Shorack was real. Shorack replied “I am! Haha. Just Checking. Because I’m tryna put  
 23      you on game.”

24           39.      TFO Tangeman and I know from training and experience that in the pimping  
 25      and prostitution culture the word “game” is a reference to pimping and prostitution. TFO  
 26      Tangeman replied by asking what exactly that meant and sent him an emoji depicting  
 27      money with a question mark. Shorack replied, “Yeah.” TFO Tangeman replied by telling  
 28      Shorack, “Well im interested I aimt got shit goin for me here. So????” Shorack then asked,

1 "You wana fly out here & have conversation over brunch?" TFO Tangeman asked, "For  
 2 real?" Shorack stated, "Yuh" (positive for yes).

3       40. On January 30, 2022, at 1408 hours, TFO Tangeman had a Confidential  
 4 Human Source (CHS) make a recorded call to Shorack at 206-696-4026. The CHS did not  
 5 have any knowledge of this investigation prior to making the call and was provided with  
 6 very basic information just so she could speak with Shorack in more detail about what his  
 7 intentions might be. All the calls made between the CHS and Shorack were recorded and  
 8 monitored by TFO Tangeman live.

9       41. After several voice mails, text messages, and missed calls, Shorack called the  
 10 CHS in the early afternoon of January 30, 2022. The call was recorded and monitored by  
 11 TFO Tangeman in real time. After exchanging pleasantries, Shorack asked the CHS how  
 12 she found his Instagram account. The CHS replied she was looking for her friend Ike and  
 13 happened upon his page. Shorack said he would love to meet the CHS and understood the  
 14 CHS did not have much going on in Colorado. Shorack told the CHS there was a lot of  
 15 opportunity in Seattle from a business standpoint, stating that Seattle is the home to many  
 16 major corporations. Shorack then clarified that he is not into "that" aspect of things  
 17 (referring to big corporations), but that Seattle as a city has a lot to offer. Shorack told the  
 18 CHS he would love to learn more about her and would love to tell her about what he does  
 19 and how he has been able to help certain people make lots of money. The CHS replied she  
 20 would love to learn from him and that she did not have much going on in Colorado.

21       42. The CHS told Shorack she was from California and was staying with friends  
 22 right now because her mother was in jail. Shorack asked how old the CHS was and she  
 23 replied "I'm seventeen." Shorack replied "okay," "right on, right on." The CHS stated she  
 24 turned eighteen "pretty soon." When Shorack asked "what's pretty soon?" The CHS  
 25 replied "eleven months." Shorack laughed and said the CHS just had a birthday. Shorack  
 26 asked if the CHS had her "ID" (referring to identification) and asked if she would be able  
 27 to fly. The CHS replied she has an identification as well as a few fake identifications.  
 28 Shorack replied "Oh wow" and "that's what's up."

1       43. When Shorack asked what brought the CHS to Colorado, she replied that she  
 2 had moved there to live with her uncle after her mother went to jail. When she arrived in  
 3 Colorado, however, he and his wife were having problem and it was awkward to live with  
 4 them. The CHS stated that she had friends as well as an on again/off again boyfriend, but  
 5 that he was not a very good person. Shorack replied that was usually how it went with on  
 6 again/off again boyfriends.

7       44. Shorack then explained that he had to protect himself and was not going to  
 8 tell the CHS everything about him. He said that he was trying to be smart because he  
 9 doesn't know the CHS and she could be anyone. Shorack stated that at same time, the  
 10 CHS has a lot of what he is looking for and that he thinks Shorack has a lot of what the  
 11 CHS is looking for. Shorack stated it would be a leap of faith on both their ends, as well as  
 12 a big financial investment for him, if he bought her a plane ticket to Seattle. Shorack  
 13 advised that he "didn't expect anything back" with regards to paying for the plane ticket,  
 14 since he makes plenty of money and the price of the ticket "is nothing." Shorack then  
 15 asked "hypothetically" what the CHS would think if he wanted to fly her to Seattle in the  
 16 next few days. The CHS replied that while she doesn't have anything going on in  
 17 Colorado, she would want to make sure she was safe because she does not know Shorack.  
 18 Shorack responded that he had asked her a trick question and that her answer was exactly  
 19 what he wanted to hear. Shorack said that he would have been more hesitant if the CHS  
 20 wanted to book the ticket right away and that her answer told him that she is smart and is a  
 21 real person. Shorack listed some safety precautions he could take to make her feel more  
 22 comfortable, and stated that in person he is a lot more fun and outspoken and "I get money  
 23 out here."

24       45. The CHS replied that she was "down," but wanted to know about safety and  
 25 precautionary stuff, including who would pick her up and where she would be staying.  
 26 Shorack replied that either he would pick her up at the airport or he would send an Uber,  
 27 whatever made her more comfortable. He also said that he could put her up at the Hyatt  
 28 Regency downtown. Shorack said that he had a few girls out "here" (Seattle) and that he

1 could send her their information so they could learn about him from a female's standpoint.  
 2 Shorack stated he was not rushing this, but the CHS said she didn't have anything going on  
 3 in Colorado, and the sooner he could get her out here the better.

4       46. The CHS asked whether she would get a job once she got to Seattle. Shorack  
 5 replied that it was up to the CHS, and that he wanted to get her to Seattle so he could meet  
 6 her in person and talk about what he sees her doing. When CHS asked what kind of  
 7 opportunities he was talking about, Shorack responded that he has all type of opportunities  
 8 and said that he is connected to strip clubs and businesses, as well as drug dealers and gang  
 9 bangers, and that he is also a real estate agent and is connected to real estate companies.  
 10 Shorack told the CHS that after the call he was going to give the CHS's Instagram to a few  
 11 girls that he knows so the CHS could talk to them about their experiences. From there, the  
 12 CHS could decide whether or not she was interested.

13       47. When the CHS asked what kind of money she could make, Shorack chuckled  
 14 and replied that "the ones that fuck with me" make anywhere from a "band to two bands" a  
 15 day, and that he netted about \$90,000 per month. I am aware through my training and  
 16 experience that "band" is a slang/street term for \$1,000. Shorack also said that he was  
 17 driving a Lamborghini while he was talking to the CHS. Shorack stated that for his  
 18 "protection" he was going to have one of his girls talk to the CHS about what they do  
 19 because it would be a little better and less suspect, and that he was protecting himself and  
 20 protecting the CHS. Shorack told the CHS that he had thought she was a cop at first, but  
 21 that after talking to her he realized she was a city girl.

22       48. Shorack said that he was going to have his girl "Snow" follow the CHS on  
 23 Instagram, and that the CHS should message Snow. Shorack told the CHS that last  
 24 Saturday, he had "blindly" flown a girl from Oakland to Seattle to be a part of what he is  
 25 doing. He said that this girl is very happy and that "seven of us" were going to be going to  
 26 a fancy steak restaurant tonight – two new girls and four who have been around a long  
 27 time. Shorack said that in addition to "Snow," L.P., T.M., and M.L. might connect with  
 28 her via Instagram as well.

1       49. After the call, TFO Tangeman checked the Niki303g IG account and noticed  
 2 that she had new follow requests from five Instagram accounts, including one in the name  
 3 “liltrapstar\_snow” and one with the same name as T.M. TFO Tangeman then messaged  
 4 Shorack and asked if “Snow” was the only one of his girls who had asked to follow her,  
 5 since she had a few other new Instagram follow requests. Shorack replied  
 6 “Nah that’s all of them;.” TFO Tangeman then viewed the images and video clips of  
 7 Snow that were uploaded to the “liltrapstar\_snow” (Snow) IG account. The images and  
 8 video clips were of a white female. In one of the images Snow is posing in underwear for  
 9 the picture. The “liltrapstar\_snow” account indicated she was being followed by several  
 10 IG users to include “iketurrnher” and the account with the same name as T.M.

11       50. On January 30, 2022 at 1446 hours, “Snow” sent a message to “Niki” from  
 12 the “liltrapstar\_snow” Instagram Account that stated, “You pretty!” TFO Tangeman  
 13 replied by saying “Snow” was gorgeous and that he didn’t know if he was good enough for  
 14 this. Snow replied by asking, “This?” TFO Tangeman replied, “Uhm . . well I had an idea  
 15 but he told me to talk to you and u would explain.” Snow then asked, “You ever heard of  
 16 the term 304.” TFO Tangeman replied, “Lol hoe rt?” (meaning: “laughing out loud hoe  
 17 right?”). Snow replied:

18           Haha yuh. 304 is a girl that walks the blade, Blade is a street called  
 19 auroa where 304’s aka hoes. Lol sell 💸 [an emoji that I am aware is  
 20 often used in the pimping/prostitution culture to refer to sex acts that  
 21 result in orgasm] 🍑 [an emoji that I am aware is often used in the  
 22 pimping/prostitution culture to refer to anal sex]. Everyone got there  
 23 own thoughts on it, but those that commit to the game run up a check!  
 24 (eye and money emojis). I used to dance, but I gave it up because the  
 25 money better. I make 2k a day. Sounded scary at first but it’s a crazy  
 26 fun lifestyle. Travel, drive nice cars, have anything I want. Work on  
 27 my own time type shit. You can also post adds on the net and do  
 28 escort type shit (followed by the “100” emoji).”

So Auroa is what we call the blade. It’s in North Seattle. It’s a coo  
 little road where there’s hella traffic and motels. A hoe mentality is a  
 girl that don’t want to work a 9-5, wants Financial freedom. With the  
 ability to live in a nice spot, drive nice cars! And best of all travel.”

1 I am aware that language used by “Snow” in the above-described texts is similar to the  
 2 recruiting language Shorack had suggested to his victims in the group chat found in L.P.’s  
 3 phone.

4       51. TFO Tangeman replied that “I kinda figured that what this was about. I get  
 5 hit up all the time in my dm’s by pimps. I down but my only concern is being g safe!!!!!!”  
 6 Is it true you bring in a rack a day cause that’s what he was telling.” Snow responded that  
 7 “We’re very safe.” Snow then sent five video clips and two images. One image was of a  
 8 large amount of cash spread out on a table and the other was of a female’s hand holding  
 9 keys while inside an apartment. The first four videos showed large amounts of cash spread  
 10 out. The fifth video clip was of a higher end white Mercedes that had an “EBA” Auto  
 11 Broker plate on the front. A Google search indicated “EBA” stands for Elliott Bay Auto  
 12 Brokers, which is located on North Aurora Avenue. The last video clip was of a black  
 13 designer YSL (Yves Saint Laurent) purse.

14       52. Both TFO Tangeman and I are aware from training and experience that when  
 15 pimps recruit victims into a life of prostitution on social media they will often display or  
 16 send the girls they are recruiting images of large amounts of cash, designer cloths, and  
 17 high-end cars as a coercive recruitment tactic. TFO Tangeman also knows from training  
 18 and experience that pimps will also have other victims that work for them, sometimes  
 19 referred to by the pimp as the “bottom bitch,” recruit victims for them on social media and  
 20 have them use similar recruitment tactics.

21       53. “Snow” continued to send additional text messages to “Niki” regarding  
 22 Shorack and what she would be doing if she came to Seattle, including the following:

- 23       • “Ike is one of the best on the west coast. We love it so much! And it’s so fun! And  
     24 our lives are changing.”
- 25       • When TFO Tangeman asked whether Shorack beat his girls, Snow replied “Nah  
     26 Seattle is great. And Ike to playa for that shit.” TFO Tangeman replied by asking  
     27 what Snow meant by “to playa.” Snow replied, “Like he’s a real p. Don’t beat on  
     no one. Just elevate.”

- 1     • When TFO Tangeman asked whether it was hard to do “dates” when she first  
2         started, “Snow” replied: “Eh the first 2. Mainly because you nervous. After that it’s  
3         fun! & all your wifeys are fun. Ike super picky too: so the fact he something in you  
4         is pretty special.”  
5  
6     • When TFO Tangeman asked whether “Snow” really recommended having her come  
7         to work for Shorack, “Snow” replied: “Girls what! You the perfect story that this  
8         game looks for. We all have fucked up childhoods and stuff. But Ike really put us  
9         in game and changed our lives. You just gotta fly up here and meet the team.”  
10  
11    • “Snow” did not immediately answer when TFO Tangeman asked how much of her  
12         prostitution earnings she would get to keep. When prompted again by TFO  
13         Tangeman, “Snow” replied: “It’s hard when we talk about the trap [referring to  
14         money], but I does it in a really good way. But all the girls on his team give him  
15         everything at the end of the night. But he opens up bank accounts for us and gives  
16         us a weekly allowance, that we don’t touch any of that money for. As well as we  
17         have a debit card that he let us use and we get anything and everything that we  
18         need.”  
19  
20    • When TFO Tangeman asked how many dates she would have to do, “Snow”  
21         replied: “He don’t set a standard. We just stay down with a good attitude! & he  
22         bring us in at a decent time.”

23           54. After talking with “Snow,” TFO Tangeman texted Shorack and told him that  
24         she had talked to “Snow.” Shorack replied: “Hahah she’s dope. She’s been with me the  
25         longest. But that’s 1 of 7.” Based on my training and experience, I interpreted this to  
26         mean that “Snow” was one of seven women working in prostitution for Shorack.

27           55. Starting in the early morning hours of January 31, 2022, Shorack continued  
28         to send TFO Tangeman text messages about booking a ticket for “Niki” to come to Seattle.  
At one point during the day, Shorack sent a message stating that he was going to book a  
flight for the next night and asking for “Niki”’s full name and date of birth. TFO  
Tangeman responded with the following name and date of birth from the fake identification  
card: “Nicole Anne Gomez 1/5/2004.” When Shorack asked if that was her real birthdate,  
TFO Tangeman responded that it was her “18 yr old” fake identification and that she also  
had a fake identification that said she was 22. TFO Tangeman then stated: “My real date

1 of birth is 1/5/2005," which would make "Niki" 17 years and 26 days old. This was the  
 2 third time in the previous two days that TFO Tangeman informed Shorack that "Niki" was  
 3 seventeen years old.

4       56. Shorack and TFO Tangeman continued to send text messages about "Niki"  
 5 flying to Seattle throughout the day. TFO Tangeman then made several unsuccessful  
 6 attempts to call Shorack on the telephone. On January 31, 2022, at approximately 6:51  
 7 p.m., Shorack called the CHS from 206-696-4026. The call was recorded and monitored  
 8 by TFO Tangeman.

9       57. Shorack told the CHS that "Snow" had just called him. Shorack went on to  
 10 say that Snow is in Houston right now and she (Snow) said the CHS would be "fine."  
 11 Snow is "playing the blade" in Houston by herself, because some of the girls like to travel  
 12 to other places to make some money. Snow asked Shorack if he wanted her to come back  
 13 and he told Snow that if she "had good numbers" this weekend, "sure," but if not they  
 14 (CHS and Snow) can always Facetime or video chat. Shorack said that Snow had a lot of  
 15 "game" and that both Snow and his other girls would show the CHS how to do things, and  
 16 that "all" these girls "in the game" are "reflections of me." Shorack stated the other girls  
 17 want to meet the CHS also.

18       58. Shorack told the CHS it was hard to think of the game as "empowering  
 19 women," but that how he thinks of it. The CHS stated the way she sees it, people have sex  
 20 for free, that's a normal thing. Shorack replied, "exactly" and "why not get paid for it."  
 21 The CHS told Shorack she was excited to meet everyone because if everyone has this  
 22 mindset, she is going to learn a lot and they are going to make so much money. Shorack  
 23 replied it was going to be good.

24       59. The CHS then asked Shorack if she could come to Seattle on Wednesday  
 25 instead of Tuesday so that she could keep a commitment with a friend. Shorack replied  
 26 yes, but noted that he has been in this game long enough to know that whenever things like  
 27 this transpire and there is a delay, it may not happen. Shorack stated he has seen it with  
 28 girls who are really good at making you think they're ready to go, but then they are never

1 ready to go. Shorack told the CHS that he was going to “keep it 100” with her, and if she  
 2 switched up the date of her flight again, it was going to be on her to come out and show  
 3 him that she wants to come. Shorack stated he is ready to pay her flight, but he only pays  
 4 for the people he likes. Shorack stated that normally if a girl wanted to “choose up” and be  
 5 around him, the girl had to find their own way to him. Shorack stated that if he felt like it  
 6 is a good thing, he would “invest.” Shorack further said that while he is not “huge,” he is  
 7 fairly well known on the West Coast. He stated that when girls see lobster dinners, pretty  
 8 girls, and Lamborghinis they want to be a part of what he has going on. Shorack said that  
 9 he doesn’t let just anyone be part of his life, and girls who want to do so have to show they  
 10 have potential. Shorack stated the CHS’s personality on the phone and her story has  
 11 intrigued him and he wants to see what she can do. The CHS replied, stating she  
 12 understood it was a once in a lifetime opportunity and she was not going to change things  
 13 up and they would see each other on Wednesday.

14       60.     The CHS asked Shorack how she was supposed to figure out what to charge.  
 15 When Shorack asked if she was talking about how to talk to “tricks,” the CHS clarified she  
 16 wanted to know how to charge them. Shorack replied “that’s all good.” Shorack then told  
 17 the CHS that one of his girls, who was working, was calling him and that he would call the  
 18 CHS back.

19       61.     Shorack called the CHS back a short time later. TFO Tangeman monitored  
 20 and recorded that call. During the call, Shorack apologized to the CHS for hanging up,  
 21 explaining that he was dealing with some other stuff. Shorack told the CHS he wanted to  
 22 answer all her questions. With regards to how the CHS would learn how to make the  
 23 money “on it,” Shorack stated “they” (meaning he and his girls) would teach the CHS that.  
 24 Shorack told the CHS that when she came in, she would be put up at a nice “spot.”  
 25 Shorack stated he and the CHS would “ride the blade” together to get acclimated with each  
 26 other, and then he would let the CHS hang out with the girls. Shorack stated that they  
 27 would tell the CHS about doing “hundred dollar dates” here, “two hundred dates here.”  
 28 Shorack stated sometimes the “trick doesn’t even want to fuck, he just wants

1 conversation.” Shorack told the CHS some of those tricks are the best tricks, because the  
 2 girls can get like \$500 just to sit in a room and talk to the dude and make him feel good.  
 3 Shorack told the CHS he could sit on the phone and tell her a lot of that, but they have a  
 4 “saying in the game” that it’s “caught more than it’s taught.” Shorack told the CHS she  
 5 just had to get here and be around it and she would understand. Shorack told the CHS she  
 6 would think it was a piece of cake, then she would “touch the money” and never want to go  
 7 back home to Colorado.

8       62.     The CHS stated that made her feel better and said she was worried about  
 9 being by herself. Shorack responded that she would not be by herself and that five or six of  
 10 his girls travel by Uber together every day. Shorack told the CHS he would make sure the  
 11 CHS was coached and that she would have all the knowledge, as well as all the girls  
 12 around her. Shorack told the CHS that he intended to partner her with one of his girls.  
 13 Shorack told the CHS the name of this girl, which was the same first name as L.P. Shorack  
 14 said that L.P. was excited to meet the CHS, and that L.P. and the CHS would share a room,  
 15 a room key, and condoms.

16       63.     The CHS then asked about “anal,” referring to anal sex. The CHS told  
 17 Shorack that she had never done it, but she was not against it and wanted to learn about it  
 18 more. Shorack stated that “that,” referring to anal sex, is something that they may or may  
 19 not get to in the future. Shorack told the CHS that anal was always an option if a trick  
 20 offered \$500 or \$1,000, but the CHS did not have to worry about that. Shorack stated he  
 21 has only had one girl do anal, approximately in the last six months. Shorack told the CHS  
 22 she has the right to tell the trick she does not do anal. Shorack then mimicked a sex buyer,  
 23 saying that if the CHS declined to do anal sex, the sex buyer would then ask “is your pussy  
 24 good? . . . boom.” The CHS clarified that she could say “no” to some things (meaning sex  
 25 acts) and Shorack replied that she could and that “they” want to make sure she is safe,  
 26 since “That’s how I roll.”

27       64.     Shorack said that the CHS is a lot like him and referred to himself as the  
 28 CHS’s “daddy.” He then clarified that he was not the CHS’s “daddy” yet, but he hoped to

1 be. I am aware from my training and experience that pimps often require their victims to  
 2 refer to them as “daddy.” Shorack and the CHS then discussed logistics of when he could  
 3 fly her in. He said that he would book the flight for Tuesday or Wednesday and would  
 4 send her a screen shot of the boarding pass.

5       65. The next day, February 1, 2022, Shorack sent TFO Tangeman a text message  
 6 at 8:38 a.m. saying “good morning!” Shorack and TFO Tangeman continued to text  
 7 throughout the day. At one point Shorack sent TFO Tangeman a text stating “I’m flying  
 8 you out tomorrow morning?” TFO Tangeman replied, “Yay” and asked if it was okay to  
 9 bring one checked bag with clothes and a carryon. Shorack replied “Yeah that’s perfect.  
 10 Cute clothes; heels if you have em, make up. Whatever you think you need for a week or  
 11 2.”

12       66. Later that day, at approximately 3:28 p.m., TFO Tangeman sent Shorack a  
 13 text message stating that a friend was willing to take her to the airport but wanted to know  
 14 what time that would be. Shorack replied that she would need to be there around noon and  
 15 said that he was “booking now.” After not hearing anything from Shorack for  
 16 approximately fifty minutes, TFO Tangeman sent Shorack a text asking “Did you book  
 17 it???” Shorack replied by stating he was sending over the “stuff” now. Shorack then tried  
 18 to call TFO Tangeman, who did not answer but instead sent him a text that he couldn’t talk  
 19 at the moment. Shorack then sent a text asking “Denver airport?”

20       67. TFO Tangeman then directed the CHS make a call to Shorack. The call was  
 21 recorded and monitored in real time. During the call, Shorack said he wanted to confirm  
 22 that he had booked the flight out of the right airport and asked if it was the Denver airport.  
 23 The CHS told Shorack that it was “DIA.” Shorack stated he was going to send the CHS a  
 24 screenshot of her boarding pass in about five minutes and said it would be a later flight.  
 25 Shorack stated it would be a 2:30 p.m. flight that landed around 4:30 p.m., and to call him  
 26 if he had any questions.

27       68. Later that day, at 8:36 p.m., TFO Tangeman received a MMS message from  
 28 Shorack that contained an image of an Alaska Airlines boarding pass for Flight 642,

1 departing Denver on February 2, 2022 at 2:55 p.m. and arriving in Seattle later that day at  
 2 4:49 p.m. The passenger listed on the boarding pass was "Nicole Gomez," which was the  
 3 false name that TFO Tangeman had provided to Shorack. He also received a second  
 4 screenshot of the booking confirmation. The flight confirmation code was ZMGRUK. No  
 5 purchaser name or account information was visible on this image. After receiving the  
 6 boarding pass, TFO Tangeman sent Shorack a text that stated, "OMG im so excited I cant  
 7 wait to see you." Shorack replied "I'm hella excited." After TFO Tangeman asked if he  
 8 was going to let him ride in his "Lambo," Shorack replied "Of course haha." Shorack told  
 9 TFO Tangeman to go to the baggage claim when he arrived.

10       69.   Shorack and TFO Tangeman continued to text throughout February 2, 2022,  
 11 the day of the scheduled flight. When TFO Tangeman sent a text message that he was  
 12 leaving for the airport, Shorack replied:

13           "For sure:)  
 14           When you get here; I'll pick you up  
       Drive around the city; get food.  
 15       And then put you in a hotel.  
 16       You'll probably meet the girls tonight  
       And we'll make a game plan for tomorrow.

17  
 18       70.   TFO Tangeman continued to send Shorack updates of his flight status. In an  
 19 effort to identify what type of car Shorack would be driving, TFO Shorack asked him if he  
 20 was meeting me at the baggage claim or if I needed to look for the "lambo." Shorack  
 21 replied: "Haha it might be one of my other cars haha but you'll walk out from baggage  
 22 claim & I'll probs be in my white Cadillac." After TFO Tangeman sent a text advising that  
 23 he was seated on the plane, Shorack replied "Safe travels! So excited to meet you. Proud  
 24 of your courage to try something new."

25       71.   Prior to this, beginning at approximately 8:00 a.m. earlier that day, law  
 26 enforcement had established surveillance at a residence in north Seattle and confirmed the  
 27 presence of a black Dodge Charger with license plate CAP 0196, which was registered to  
 28

1 Isaac Shorack. Surveillance was maintained on Shorack throughout the duration of the  
2 day.

3 72. On February 2, 2022, prior to Flight 642's scheduled arrival at Seattle-  
4 Tacoma International Airport, surveillance observed Shorack depart from his residence in  
5 the black Dodge Charger and travel directly the airport.

6 73. At 6:26 p.m., I informed TFO Tangeman that Flight 642 had landed in  
7 Seattle and that the passengers were exiting the plane. TFO Tangeman then sent a text to  
8 Shorack letting him know that he had arrived. At 6:29 p.m., Shorack sent a text that he  
9 was close but that traffic was horrible. TFO Tangeman asked if Shorack would be in the  
10 white Cadillac and he replied in the affirmative.

11 74. At 6:36 p.m., TFO Tangeman directed the CHS to call Shorack. The call was  
12 recorded and monitored in real time. During the call, the CHS told Shorack she was headed  
13 toward him and confirmed he was going to meet her at baggage claim. Shorack gave the  
14 CHS specific instructions on where to go to meet him. He stated that from Alaska Airlines  
15 she would be able to walk to the carousel where her bag would come off the plane.  
16 Shorack stated there would be sliding glass doors leading out to where the passenger pick  
17 up is located and that he should be there in a little bit. He talked about how the traffic was  
18 moving a little slow and said he was ten to fifteen minutes away and told her where she  
19 could wait for him. Shorack then asked the CHS if she was law enforcement or affiliated  
20 with law enforcement. The CHS stated no, and Shorack replied that he just always has to  
21 ask because you never know. Shorack stated that "someone" told him to be careful,  
22 indicating that he may have talked to another person about Niki.

23 75. The CHS told Shorack that she felt like she need to ask him if he was law  
24 enforcement. Shorack stated no and went on to explain to the CHS that there were other  
25 things at play that are super dangerous to him if she was law enforcement. Shorack stated  
26 he definitely was not law enforcement and was "legit." He stated he had to make sure he  
27 was playing it safe for himself. Shorack stated he never had to ask for himself but that he  
28

1 was excited about how she (the CHS) came to Seattle and wanted to make sure he was  
 2 being extra cautious, which one day the CHS would appreciate.

3       76. On February 2, 2022, at approximately 6:55 p.m., Shorack stated he was  
 4 coming up to baggage claim. TFO Tangeman told him he was inside by door number 10  
 5 Shorack then tried to call TFO Tangeman, but he did not answer. Shorack then sent TFO  
 6 Tangeman a text that stated “Gotcha” in response to TFO Tangeman telling him he was at  
 7 door number 10.

8       77. When Shorack arrived at passenger pickup for Alaska flights, he was  
 9 contacted by a Seattle Port Authority (SPA) marked unit and taken into custody without  
 10 incident. SPA officers observed Shorack holding a phone and placing it inside the driver’s  
 11 side door. SA Ben Williamson recovered the phone from the door and provided it to SA  
 12 Butler.

13       78. I informed TFO Tangeman Shorack’s phone was recovered and requested he  
 14 make a controlled call to it using the undercover phone that he used to communicate with  
 15 Shorack on during this investigation. At approximately 7:04 p.m., TFO Tangeman made a  
 16 call from his UC phone (720-310-3884) to 206-696-4026. When TFO Tangeman made the  
 17 call, I observed the phone receiving an incoming call from a contact identified “Niki,” thus  
 18 confirming Shorack was in possession of the phone that was used to recruit “Niki,” whom  
 19 he believed to be a seventeen-year-old female, to work for him as a prostitute and he would  
 20 act as her pimp.

21       79. At approximately 7:05 p.m., TFO Tangmena sent a message that stated “test”  
 22 to the “iketurrrher” Instagram account from the “niki303g” Instagram account. I did not  
 23 observe an incoming banner on the phone. A few minutes later, TFO Tangeman called the  
 24 iketurrrher Instagram account from the niki303g Instagram account. I observed that the  
 25 phone was receiving an Instagram call from “Brooke.” TFO Tangeman informed me that  
 26 “Brooke” was the user name associated with the undercover “niki303g” Instagram account  
 27 at that time. This confirmed that Shorack was in possession of the phone that was linked to  
 28 the iketurrrher Instagram account, which was used to recruit “Niki,” whom he believed to

1 be a seventeen-year-old female, to work for him as a prostitute and he would act as her  
2 pimp.

3       80.     SA Hippe and I attempted to interview Shorack who, after being read his  
4 *Miranda* rights, stated that he would like to talk to his lawyer prior to speaking with law  
5 enforcement. The interview ceased and Shorack was transported to the federal detention  
6 center.

**ROBERT SPIVEY, Complainant  
Special Agent, Federal Bureau of  
Investigation**

Based on the Complaint and Affidavit sworn to before me, the Court hereby finds that there is probable cause to believe the Defendant committed the offenses set forth in the Complaint.

Dated this 3rd day of February, 2022.

The Honorable MARY ALICE THEILER  
United States Magistrate Judge